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**Via ECF**

Honorable Katharine H. Parker, U.S.M.J.  
 United States District Court  
 500 Pearl Street  
 New York, NY 10007

**Re: Paguay v. ESH Restaurant Group LLC, et al. S.D.N.Y. No. 23-cv-8434 (JPO) (KHP)**

Your Honor:

Our firm represents Defendants in the above-captioned matter.

We write to respectfully request that the Court extend the March 1, 2024 deadline to submit reply papers in further support of Defendants' motion to compel arbitration and dismiss until March 8, 2024, and further request that the Court set March 8, 2024 as the deadline for Defendants to oppose Plaintiff's cross-motion<sup>1</sup> for Rule 23 class certification and related injunctive and declaratory relief. This is the second request for the foregoing extensions.

This brief 1 week extension is necessary as I have been dealing with a medical issue which has unfortunately prevented me from finalizing the opposition/ reply papers in coordination with our clients. I reached out to Mr. Lee's office yesterday by phone and email to seek consent for this extension request, but did not receive a response. I do not anticipate the need for further extensions after this one, and respectfully request that Your Honor grant this request.

We thank Your Honor for considering this extension application.

Respectfully Submitted,  
**KAUFMAN DOLOWICH, LLP**



By: \_\_\_\_\_  
 Taimur Alamgir

APPLICATION GRANTED. The deadline for Defendants to submit reply papers in support of the motion to compel arbitration and dismiss, as well as its opposition to Plaintiffs' cross-motion, is extended to **March 8, 2024**. This deadline will not be further extended absent a showing of good cause. The deadline for Plaintiffs to submit their reply papers in support of the cross-motion is **March 22, 2024**. Defendants are reminded that, under my Individual Practices, absent good cause, any request for an extension or adjournment must be made at least two business days in advance of the deadline. Counsel should also allow sufficient time for the opposing party to state its position on any request for an extension or adjournment prior to submitting the letter motion.

**SO ORDERED:**

*Katharine H. Parker*

HON. KATHARINE H. PARKER  
 UNITED STATES MAGISTRATE JUDGE

3/4/2024

<sup>1</sup> We reserve the right to object to the cross-motion as procedurally deficient.